

The Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

MICHAEL HOLEN, individually,

Plaintiff

vs.

SASA JOZIC, individually, and JANE DOE
JOZIC, and the marital community composed
thereof, BLUE LAND TRANSPORTATION,
INC., a foreign corporation, and COASTAL
PACIFIC XPRESS, INC., a foreign corporation,

Defendants.

NO. 2:17-CV-01147-JLR

STIPULATION AND ORDER GRANTING
LEAVE TO AMEND COMPLAINT FOR
PERSONAL INJURIES AND DAMAGES

STIPULATION.

The parties, by and through their attorneys of record, stipulate as follows:

1. On June 29, 2017, Plaintiff filed a Summons and Complaint for Damages in the King County Superior Court. In his Complaint, Plaintiff sought damages for injuries incurred in a motor vehicle collision September 28, 2014 when a tractor/trailer drove into the rear of a construction vehicle on I-5 Southbound near the 175th Street exit.

2. In his Complaint, Plaintiff named Sasa Jozic, Blue Land Transportation, Inc. ("BLT") and Coastal Pacific Xpress, Inc. ("CPX") as defendants.

3. Sasa Jozic was the driver of the tractor/trailer involved in the collision.

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Everett, WA 98201
(425)229-1241

1 4. Defendant BLT owned of the tractor that defendant Jozic was driving.

2 5. Defendant CPX owned the trailer being towed by the Blue Land Transportation tractor.

3 6. Plaintiff served defendants BLT and CPX on June 30, 2017.

4 7. Plaintiff served defendant Jozic on 9/25/17

5 8. Defendants Jozic and BLT appeared and filed their Notice of Removal from King County
6 Superior Court to the United States District Court for the Western District of Washington.

7 9. Defendants Jozic and BLT filed and served their Answer on August 7, 2017.

8 10. In his Complaint, Plaintiff alleged that Jozic was employed by one or both defendants.

9 11. In the course of discovery, Plaintiff obtained copies of two written contracts entered into
10 between defendants BLT and CPX, which purports to set forth the relationship between those
11 Defendants.

12 12. Plaintiff has taken the depositions of representatives of BLT and CPX, as well Plaintiff's
13 deposition.

14 13. While BLT's and CPX's representatives testified differently as to the applicability of the two
15 contracts to this case, they did clarify the situation with defendant Jozic's employment.

16 14. At his deposition, defendant Jozic testified that to the facts of the subject collision.

17 Pursuant to LCR 15, a copy of the First Amended Complaint for Personal Injuries and Damages
18 is attached hereto as Exhibit 1, and a marked up copy of the First Amended Complaint for Personal
19 Injuries and Damages is attached hereto as Exhibit 2.

20 The parties stipulate to the amendment of the Complaint.

1 Dated: June 18, 2018

2 Kadish Twersky Law Firm

3
4 By: [Signature]
Jeffrey Twersky, #26581
Attorneys for Plaintiff

5
6 Dated: June , 2018

7 Office of Vitale & Wallace

8 Approved to sign by email
9 By: [Signature] 26581
Gregory C. Wallace, #29029
Attorneys for Defendant
10 Coastal Pacific Express

Dated: June 29, 2018

Scheer Law Group LLP

11
12 By: [Signature] USA #43790
Dennis G. Woods, #28713
Attorneys for Defendant
Blue Land Transportation, Inc.

Dated: June 30, 2018

Law Offices of Douglas R. Soderland

13 By: [Signature]
Douglas R. Soderland, #16439
Attorneys for Defendant
Sasa Jozic

14 ORDER

15 THIS MATTER having come on before the Court on stipulation of the parties,

16 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Court grants to Plaintiff
17 leave to amend Complaint. Plaintiff must file his amended complaint (Ex. 1)
18 within three (3) days of the date of this order.

19 IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that service of the
20 First Amended Complaint may be made on all Defendants by serving their respective counsel of
21 record by mail.

22 Dated: July 11th
Dated: June , 2018

[Signature]
Honorable James L. Robart

STIPULATION AND ORDER GRANTING LEAVE TO AMEND
COMPLAINT FOR PERSONAL INJURIES AND DAMAGES - 3

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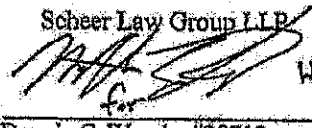
1 Presented by:

Approved as to form;
Notice of presentation waived:

2 Kadish Twersky Law Firm

Scheer Law Group LLP

3 By: 
4 Jeffrey Twersky, #26581
Attorneys for Plaintiff

By:  WSPA #43790
Dennis G. Woods, #28713
Attorneys for defendant
Blue Land Transportation, Inc.

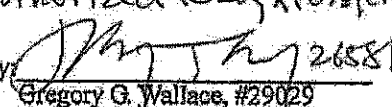
6 Approved as to form;
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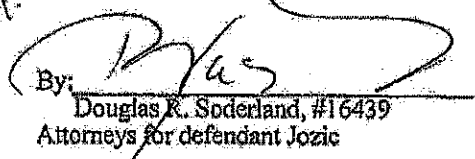
Approved as to form;
Notice of presentation waived:

7 Law Office of Vitale & Wallace

Law Offices of Douglas R. Soderland

8 Authorized to sign for by email:

9 By: 
10 Gregory G. Wallace, #29029
Attorneys for defendant
Coastal Pacific Xpress

By: 
Douglas R. Soderland, #16439
Attorneys for defendant Jozeic

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STIPULATION AND ORDER GRANTING LEAVE TO AMEND
COMPLAINT FOR PERSONAL INJURIES AND DAMAGES - 4

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